

STATE OF NEW YORK)
) ss.:
COUNTY OF)

ARMAND PICARI, being duly sworn, deposes and says:

1. I am the Junior Network Administrator at Touro University ("Touro").
2. As a Junior Network Administrator, my many responsibilities include assisting with network administration and security.
3. On December 6, 2023, at approximately 4:30pm, Charles Mattiello, Deputy Chief Information Officer, requested a user activity report detailing file downloads for Dr. Edward Farkas.
4. A user activity report is automatically generated from the administrator console and shows all activity from a specific account.
5. The report evidenced a substantial amount of activity and file downloads. Specifically, 4,962 files were downloaded on December 1, 2023 and December 4, 2023.
6. I shared the report with Mr. Mattiello later in the late afternoon of December 6, 2023.
7. The report included files and/or documents with the following names, among others:
 - a) List of Faculty Development Programs.pdf
 - b) Risk Assessment Instrument from the EMR.pdf
 - c) Research Grants.pdf
 - d) SGA Bylaws.pdf
 - e) [CLIENT NAME REMOVED FOR CONFIDENTIALITY] Hospital Agreement.pdf
 - f) TCDM Summative Examinations vs 12 CODA Standards Grid.pdf
 - g) TCDM Competencies vs. 12 CODA Standards.pdf
 - h) Touro College Strategic Plan.pdf
 - i) CODA Steering Committee Agenda 5-15-19.docx
 - j) 1.2.3 TCDM Assessment Calendar July 2019-June 2020.pdf
 - k) 1.8.1 Touro College Middle States Accreditation Status.pdf

- l) 2.4.3 Curriculum Map.pdf
- m) Exhibit 7 - Alumni Survey for PG Ortho draft (1).docx
- n) Exhibit 77 - Syllabus Research Methods and Biostatistics.docx
- o) Exhibit 1 - Outcomes Assessment PG Ortho Goals, Outcomes (Appendix B).docx
- p) Exhibit 33 - Minutes TCDM Advanced Education in Orthodontics and Dentofacial Orthopedics faculty meeting 20211215.docx
- q) Exhibit 6 - Orthodontic Case Completion Form Template for Electronic Health Record.docx
- r) Exhibit 57 - Emergency Cart Inspection Log template.png
- s) Exhibit 75 - Curriculum Map PG Orthodontics and Dentofacial Orthopedics.xlsx
- t) Steering Committee - CODA 2020 and 2021
- u) TCDM Discounts
- v) [FACULTY NAME REMOVED FOR CONFIDENTIALITY] @touro.edu - 's Files and Folders
- w) TCDM NM Hiring Plan_05.01.2022 (1).xlsx
- x) TCDM NM Hiring Plan_05.01.2022.xlsx
- y) building14A_roof.dgn
- z) Citi Business Statement June 2021.pdf
- aa) Guidelines for increased enrollment.pdf
- bb) Citi Business Statement May 2022.pdf
- cc) NM Info Exchange Attendee List, 3-24-22.xlsx
- dd) TCDM Master Course Guide 20200115 CODA Submission.pdf
- ee) 3.1.7 Job Description Director of Clinical Education.pdf
- ff) 3.1.6 Job Description Director of Pre-Clinical Education.pdf
- gg) 3.1.8 Job Description Clinical Practice Leader.pdf
- hh) 2.9.3 Public Relations Copy from Local Media.pdf
- ii) 2.3.1 Course Listing by Year.pdf
- jj) 2.2.3 Touro College Employee Handbook for Administrative Personnel.pdf
- kk) 22-10-14 Touro NM Expansion CODA Responses_AAL (Draft) RM+JW+KH+RM.docx
- ll) CODA Steering Committee Minutes 7-24-19.docx
- mm) TCDM & NYMC Auditorium Specs.pdf
- nn) TCDM 19 Skyline Auditorium, Testing Center Specs.pdf
- oo) NYMC Auditorium Specs.pdf
- pp) TCDM 19 Skyline Conference Room Specs.pdf
- qq) Comments on Floor Plans Lovelace.pdf
- rr) TCDM NM Hiring Plan_05.01.2022.xlsx
- ss) TCDM NM Hiring Plan.xlsx
- tt) TCDM NM Class Size Increase Application_04.19.2022.docx

I affirm under penalty of perjury under the laws of the State of New York that the foregoing paragraphs are true and correct.


Armand Picari